## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Bankruptcy No. 22-10166-elf

JOHN P. KERR, AKA JOHN KERR,

Debtor

SPECIALIZED LOAN SERVICING, LLC AS SERVICER FOR MORGAN STANLEY MORTGAGE LOAN TRUST 2007-8XS, U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE, SUCCESSOR IN INTEREST TO BANK OF AMERICA, NATIONAL ASSOCIATION, AS TRUSTEE, SUCCESSOR BY MERGER TO LASALLE BANK NATIONAL ASSOCIATION, AS TRUSTEE,

Movant

v.

JOHN PATRICK KERR AKA JOHN KERR, LINDANN KERR and KENNETH E. WEST, Chapter 13 Trustee Respondents

Chapter 13

Document No.

## NOTICE OF MOTION, RESPONSE DEADLINE, AND HEARING DATE

Specialized Loan Servicing, LLC as Servicer for Morgan Stanley Mortgage Loan Trust 2007-8XS, U.S. Bank National Association, as Trustee, successor in interest to Bank of America, National Association, as Trustee, successor by merger to LaSalle Bank National Association, as Trustee has filed an Amended Motion for Relief from the Automatic Stay and Co-Debtor Stay with the Court to lift the automatic stay regarding the property known as 430 Ashley Dr, Hatboro, PA 19040.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

- 1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before, **Tuesday**, **December 6**, **2022**, you, or your attorney must do **all** of the following:
  - (a) file an answer explaining your position at:

Clerk, U.S. Bankruptcy Court Robert C. Nix Bldg. Suite 201 900 Market Street Philadelphia, PA 19107 If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorneys:

Keri P. Ebeck, Esquire Bernstein-Burkley, P.C. 601 Grant Street, 9<sup>th</sup> Floor Pittsburgh, PA 15219

- 2. If you or your attorney do not take these steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.
- 3. A hearing on the motion is scheduled to be held before the Honorable Eric L. Frank on **Tuesday**, **December 20, 2022 at 9:30 a.m. in Courtroom #1**, United States Bankruptcy Court, 900 Market Street, Philadelphia, PA 19107.
- 4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been cancelled because no one filed an answer.

Respectfully submitted,

BERNSTEIN-BURKLEY, P.C.

By:/s/ Keri P. Ebeck Keri P. Ebeck, Esq. PA I.D. #91298 kebeck@bernsteinlaw.com 601 Grant Street, 9<sup>th</sup> Floor Pittsburgh, PA 15219 (412) 456-8112

Counsel for Specialized Loan Servicing, LLC as Servicer for Morgan Stanley Mortgage Loan Trust 2007-8XS, U.S. Bank National Association, as Trustee, successor in interest to Bank of America, National Association, as Trustee, successor by merger to LaSalle Bank National Association, as Trustee

Dated: November 22, 2022